

1 WILLIAM A. ISAACSON (*Pro hac vice*)  
(wisaacson@bsfllp.com)  
2 STACEY K. GRIGSBY (*Pro hac vice*)  
(sgrigsby@bsfllp.com)  
3 NICHOLAS A. WIDNELL (*Pro hac vice*)  
(nwidnell@bsfllp.com)  
4 JONATHAN M. SHAW (*Pro hac vice*)  
(jshaw@bsfllp.com)  
5 BOIES SCHILLER FLEXNER LLP  
6 1401 New York Avenue, NW, Washington, DC 20005  
7 Telephone: (202) 237-2727; Fax: (202) 237-6131

8 RICHARD J. POCKER, State Bar No. 3568  
(rpocker@bsfllp.com)  
9 BOIES SCHILLER FLEXNER LLP  
300 South Fourth Street, Suite 800, Las Vegas, NV 89101  
10 Telephone: (702) 382-7300; Fax: (702) 382-2755

11 DONALD J. CAMPBELL, State Bar No. 1216  
(djcc@campbellandwilliams.com)  
12 J. COLBY WILLIAMS #5549  
(jcw@campbellandwilliams.com)  
13 CAMPBELL & WILLIAMS  
14 700 South 7th Street, Las Vegas, NV 89101  
15 Telephone: (702) 382-5222; Fax: (702) 382-0540

16 *Attorneys for Defendant* Zuffa, LLC, d/b/a  
17 Ultimate Fighting Championship and UFC

18 [Additional Counsel Listed on Signature Page]

19 **UNITED STATES DISTRICT COURT**  
20 **DISTRICT OF NEVADA**

21 Cung Le, Nathan Quarry, Jon Fitch, Brandon  
22 Vera, Luis Javier Vazquez, and Kyle  
23 Kingsbury on behalf of themselves and all  
others similarly situated,

24 Plaintiffs,

25 v.

26 Zuffa, LLC, d/b/a Ultimate Fighting  
27 Championship and UFC,

28 Defendant.

Case No.: 2:15-cv-01045-RFB-BNW

**ZUFFA, LLC'S NOTICE OF NON-  
PARTY WME|IMG, LLC'S LETTER  
REQUESTING GUIDANCE  
REGARDING THE PROCESS FOR  
PROTECTING NON-PARTIES'  
CONFIDENTIAL DOCUMENTS**

Defendant Zuffa, LLC (“Zuffa”) by and through its undersigned attorneys, hereby provides the Court with notice of a letter from non-party WME|IMG, LLC (“WME”) requesting guidance regarding the process for protecting non-parties’ confidential documents. On February 1, 2019, this Court held a Pre-Hearing Conference regarding the Evidentiary Hearings, and ordered the parties to exchange exhibit lists on March 24, meet and confer regarding those exhibit lists, and file any objections to the exhibit lists by June 14, 2109. ECF No. 649. On May 28th, Zuffa and Plaintiffs (collectively, “the Parties”), provided notice to all non-parties whose documents appeared on the Parties’ exhibit lists. Declaration of Jonathan M. Shaw in Support of Zuffa’s Notice of Non-Party WME|IMG, LLC’s Letter Requesting Guidance Regarding the Process for Protecting Non-Parties’ Confidential Documents (“Shaw Decl.”), ¶ 4. WME was among the non-parties that raised objections during their meet and confer regarding the confidentiality of certain of their documents included on the exhibit list. Shaw Decl. ¶ 5. WME sent a letter to the Parties for submission to the Court that objected to the disclosure of certain confidential WME documents and requested an opportunity to be heard by the Court, which the Parties submitted as an exhibit to a Joint Notice of Third Party Objection Letters Regarding Certain Third Party Documents Listed in The Parties Exhibit Lists on June 14, 2019. ECF No. 661-3.

On June 28, 2019, Plaintiffs served two 10-page briefs, with 16 exhibits, in opposition to WME’s and other non-parties’ letters to the Court. Shaw Decl. ¶ 9. Plaintiffs also informed WME by email that they must submit replies to Plaintiffs’ briefing by July 12, 2019. *Id.* ¶ 10 & Ex. A. Counsel for Zuffa attended each of the meet and confer sessions between Plaintiffs and the non-parties, and at no point in these discussion did Plaintiffs indicate 1) that the non-parties needed to file a brief to preserve their objections; 2) that Plaintiffs believed the objection letters the Parties jointly filed for the non-parties were insufficient to preserve the non-parties’ objections; or 3) that the briefing schedule that the Parties agreed would govern the Parties’ substantive objections to the exhibit lists would apply to non-parties *Id.* ¶¶ 6, 8. Zuffa does not believe that non-parties are required to submit briefing in advance of the deadlines put forward by Plaintiffs to be in compliance with the Revised Stipulation and Protective Order, which provides for a separate procedure. In

1 light of the July 11, 2019 email from the Courtroom Administrator clarifying the Court's prior order  
2 (ECF No. 670) to the extent the Court expects non-parties to submit reply briefs to Plaintiffs' brief,  
3 Zuffa believes that an extension would be appropriate. *Id.* ¶ 11.

4 WME has prepared a letter to the Court requesting guidance regarding the process for  
5 protecting non-parties' confidential documents and, if the Court wishes it to file a responsive brief  
6 at this time, an extension of time within which to do so. A true and correct copy of this letter is  
7 attached to this notice for the Court's review. Shaw Decl. Ex. B.

Dated: July 12, 2019

Respectfully Submitted,

BOIES SCHILLER FLEXNER LLP

By: /s/ Jonathan M. Shaw

Jonathan M. Shaw

WILLIAM A. ISAACSON (*Pro hac vice*)

(wisaacson@bsfllp.com)

STACEY K. GRIGSBY (*Pro hac vice*)

(sgrigsby@bsfllp.com)

NICHOLAS A. WIDNELL (*Pro hac vice*)

(nwidnell@bsfllp.com)

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DONALD J. CAMPBELL, State Bar No. 1216

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J. COLBY WILLIAMS #5549

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700 South 7th Street, Las Vegas, NV 89101

Telephone: (702) 382-5222; Fax: (702) 382-0540

*Attorneys for Defendant Zuffa, LLC, d/b/a*

*Ultimate Fighting Championship and UFC*